

Child Protective Proceedings Benchbook

A Guide to Abuse and Neglect Cases
THIRD EDITION



Michigan Judicial Institute

By Tobin L. Miller, J.D.

Michigan Supreme Court

- Hon. Clifford W. Taylor, *Chief Justice*
- Hon. Michael F. Cavanagh, Hon. Elizabeth A. Weaver, Hon. Marilyn J. Kelly, Hon. Maura D. Corrigan, Hon. Robert P. Young, Jr., Hon. Stephen J. Markman, *Justices*
- Carl L. Gromek, *State Court Administrator*

Michigan Judicial Institute Staff

- Dawn F. McCarty, *Director*
- Anne M. DeMarco, *Program Assistant*
- Rachael Drenovsky, *Learning Center Coordinator*
- Mary Galliver, *Research Attorney*
- Phoenix Hummel, *Research Attorney*
- Denise D. Kruger, *Administrative Assistant*
- Lisa Kutas, *Distance Learning Specialist*
- Mary Ann McDaid, *Multimedia Specialist*
- Tobin L. Miller, *Publications/Program Manager*
- Shawn Olds, *Office Assistant*
- Kristen Osterlund, *Program Assistant*
- Tricia A. Shaver, *Program Assistant*
- Peter C. Stathakis, *Program Manager*
- Cathy Weitzel, *Program/Conference Center Coordinator*

The research done on this benchbook is current through April 1, 2006. This benchbook is not intended to be an authoritative statement by the Justices of the Michigan Supreme Court regarding any of the substantive issues discussed. However, it does represent the consensus of the author and the advisory committee members regarding these issues.

Acknowledgments

This third edition of the *Child Protective Proceedings Benchbook* was produced in April 2006 to bring the text up to date. The first edition of the *Child Protective Proceedings Benchbook* was funded by the Court Improvement Program, the State Court Administrative Office (SCAO). The Michigan Judicial Institute (MJJI) thanks the Court Improvement Program and SCAO for their generous support.

Although this benchbook is primarily intended for use by judges and referees presiding over child protective proceedings in the Family Division of Circuit Court, it also contains information useful to all participants in the child protection system in Michigan. It is hoped that this benchbook will be of use to anyone who participates in that system, and that this benchbook will help those dedicated to improving the lives of Michigan's children.

Work on the first edition of this benchbook was overseen by an Advisory Committee comprised of judges, referees, court administrators, social services administrators, prosecutors, private attorneys, and other experts involved in the child protection system in Michigan. Advisory Committee members assisted the author in selecting topics for discussion and organizing the material in the benchbook. They also spent many hours reviewing those portions of the text that addressed their areas of expertise. The Michigan Judicial Institute gratefully acknowledges the time, helpful advice, and expertise contributed by the Advisory Committee members. The Advisory Committee members for the first edition were:

- | | | |
|--|--|--|
| ◆ Hon. Michael J. Anderegg
Chief Judge
Marquette County Probate Court | ◆ Jeffrey R. Fink
Assistant Prosecuting Attorney
Kalamazoo County Prosecutors
Office | ◆ Hon. Frances Pitts
Probate Judge
Assigned to Family Division
3d Circuit Court
Wayne County |
| ◆ Ron Apol
Supervisor/Hearing Referee
Permanency Planning Department
Family Division
17th Circuit Court
Kent County | ◆ Michael D. Foley
Executive Director
Children's Charter of the Courts of
Michigan, Inc. | ◆ Thomas C. Robison
Court Administrator
56th Circuit Court
Eaton County |
| ◆ William P. Bartlam
Deputy Court Administrator
6th Circuit Court
Oakland County | ◆ Brien R. Fortino
Assistant Prosecuting Attorney
Eaton County Prosecutors Office | ◆ Hon. John P. Steketee
Chief Judge of Family Division
17th Circuit Court
Kent County |
| ◆ Nannette Bowler
Former Executive Director and
Counsel Children's Commission
Office of Lieutenant Governor | ◆ Thomas P. Fruechtenicht
Attorney at Law
Lansing | ◆ Hon. Susan E. Vandercook
Chief Judge of Family Division
4th Circuit Court
Jackson County |
| ◆ Hon. Joseph A. Costello, Jr.
Circuit Judge
Assigned to Family Division
38th Circuit Court
Monroe County | ◆ Linda Glover
Coordinator
Court Improvement Program
State Court Administrative Office | ◆ Frank E. Vandervort
Program Manager
Michigan Child Welfare Law
Resource Center
University of Michigan Law School |
| ◆ David H. Dorr
Referee, Family Division
17th Circuit Court
Kent County | ◆ Richard A. Kerbawy
Referee, Family Division
30th Circuit Court
Ingham County | ◆ George Zulakis
Attorney at Law
Baird & Zulakis, PC
Okemos |
| | ◆ Susan L. Leahy
Special Assistant to the Director for
Child Welfare
Family Independence Agency | |

The Michigan Judicial Institute was created in 1977 by the Michigan Supreme Court. MJI is responsible for providing educational programs and written materials for Michigan judges and court personnel. In addition to the formal seminar offerings, MJI is engaged in a broad range of publication activities, services, and projects that are designed to enhance the professional skills of all those serving in the Michigan court system. MJI welcomes comments and suggestions. Please send them to: **Michigan Judicial Institute, P.O. Box 30205, Lansing, MI 48909, (517) 373-7171.**

Child Protective Proceedings Benchbook Chapters

CHAPTER 1: Introduction

CHAPTER 2: Reporting & Investigating Suspected Child Abuse & Neglect

CHAPTER 3: Obtaining Protective Custody of a Child

CHAPTER 4: Jurisdiction, Venue, & Transfer

CHAPTER 5: Notice & Time Requirements

CHAPTER 6: Petitions & Preliminary Inquiries

CHAPTER 7: Preliminary Hearings

CHAPTER 8: Placement of a Child

CHAPTER 9: Pretrial Proceedings

CHAPTER 10: Pleas of Admission or No Contest

CHAPTER 11: Common Evidentiary Issues in Child Protective Proceedings

CHAPTER 12: Trials

CHAPTER 13: Initial Dispositions

CHAPTER 14: Paying the Costs of Child Protective Proceedings

CHAPTER 15: Review of Referee's Recommended Findings & Conclusions

CHAPTER 16: Dispositional Review Hearings

CHAPTER 17: Permanency Planning Hearings

CHAPTER 18: Hearings on Termination of Parental Rights

CHAPTER 19: Post-Termination Review Hearings

CHAPTER 20: "Child Custody Proceedings" Involving Indian Children

CHAPTER 21: Appeals

CHAPTER 22: Family Division Records

Subject Matter Index

Citation Index

Case Citation Index

Table of Contents

Chapter 1: Introduction	1
1.1 Summary of Benchbook Contents	1
1.2 Table Summarizing Michigan Statutes and Court Rules Related to Child Protective Proceedings	4
1.3 Applicable Federal Law and Regulations	7
1.4 Application of the Michigan Rules of Evidence	10
 Chapter 2: Reporting & Investigating Suspected Child Abuse & Neglect	 11
2.1 Definitions Under the Child Protection Law	12
2.2 Mandatory Reports of Suspected Abuse or Neglect	24
2.3 Non-Mandatory Reports of Suspected Abuse or Neglect	26
2.4 Child Abuse Reports by Judges Under the Parental Rights Restoration Act	26
2.5 “Reasonable Cause to Suspect” Abuse or Neglect	27
2.6 Time Requirements for Mandatory Reports of Suspected Abuse or Neglect	29
2.7 Investigation and Referral Requirements	29
2.8 Required Cooperation Between DHS and Law Enforcement Officials	33
2.9 Required Use of Protocols	33
2.10 Using Videorecorded Statements	34
2.11 Investigation and Custody Requirements When a Child Is Brought to a Hospital	35
2.12 Required Procedures for Contacting a Child at School	36
2.13 Interviewing a Child Out of the Presence of a Suspected Abuser	37
2.14 The Use of Court Orders in Investigating Suspected Abuse or Neglect	37
2.15 Constitutional Requirements for Reporting and Investigating Suspected Child Abuse or Neglect	38
2.16 DHS Access to Confidential Records to Investigate Suspected Abuse or Neglect	46
2.17 DHS Registry of Reports of Abuse and Neglect	50
2.18 Access to DHS’s Registry	51
2.19 Required Response by the DHS Following Investigation	54

2.20	Who May File a Petition Seeking Court Jurisdiction	57
2.21	Time Requirements for Filing a Petition in Cases Involving Severe Physical Injury or Sexual Abuse	57
2.22	Required Request for Termination of Parental Rights at Initial Dispositional Hearing	58
2.23	Liability and Immunity	61

Chapter 3: Obtaining Protective Custody of a Child 71

3.1	Obtaining Temporary Protective Custody of a Child Without Court Order	71
3.2	Obtaining Protective Custody of a Child With Court Order	72
3.3	Required Investigation Before Placing a Child With Relatives Pending Preliminary Hearing	74
3.4	Required Procedures After a Child Is in Protective Custody	74
3.5	Time Requirements for Preliminary Hearing When a Child Is in Protective Custody	75
3.6	Temporary Custody of a Child Admitted to a Hospital	76
3.7	Ordering Medical Treatment for a Child	76
3.8	Taking Temporary Protective Custody of a Child Pursuant to the Safe Delivery of Newborns Law	83

Chapter 4: Jurisdiction, Venue, & Transfer 87

4.1	Subject Matter Jurisdiction and Personal Jurisdiction	88
4.2	Statutory Bases of Personal Jurisdiction	92
4.3	Definition of “Nonparent Adult”	94
4.4	Temporary Neglect Is Sufficient for Court to Take Jurisdiction	95
4.5	Parental Culpability Is Not Required for Court to Take Jurisdiction of a Child Because of an Unfit Home	95
4.6	Anticipatory Neglect or Abuse Is Sufficient for Court to Take Jurisdiction of a Newborn Child	96
4.7	Case Law Defining Culpable Failure or Refusal to Provide Support or Care (“Neglect”)	97
4.8	Case Law Defining “Substantial Risk of Harm” to a Child’s Mental Well-Being (“Emotional Neglect”)	98
4.9	Case Law Defining “Abandonment”	99
4.10	Case Law Defining “Without Proper Custody or Guardianship”	100
4.11	Case Law Defining “Unfit Home Environment”	102
4.12	Court’s Authority to Take Jurisdiction Over a Child Following the Appointment of a Guardian	104
4.13	Waiver of Jurisdiction in Divorce Proceedings	108
4.14	Procedures for Handling Cases When Child Is Subject to Prior or Continuing Jurisdiction of Another Court in Michigan	109
4.15	Procedures for Handling Interstate Cases	111

4.16	Continuation of Family Division Jurisdiction After Child Becomes 18 Years of Age	116
4.17	Family Division Jurisdiction and Authority Over Adults	117
4.18	Family Division Jurisdiction of Contempt Proceedings	117
4.19	Change of Venue	118
4.20	Transfer of Case to County of Residence	118
4.21	Responsibility for Costs of Disposition	120

Chapter 5: Notice & Time Requirements 121

5.1	Service of Process in Child Protective Proceedings	121
5.2	Establishing Paternity	128
5.3	Issuance and Service of Summons	136
5.4	Notice of Hearings in Child Protective Proceedings	140
5.5	Persons Entitled to Notice of Hearings	143
5.6	Special Notice Provisions for Physicians	147
5.7	Special Notice Provisions for Incarcerated Parties	147
5.8	Waiver of Defects in Service of Process or Notice of Hearing	150
5.9	Subpoenas	151
5.10	Proof of Service	151
5.11	Judgments and Orders	153
5.12	Adjournments and Continuances in Child Protective Proceedings	154
5.13	Table of Time and Notice Requirements in Child Protective Proceedings	155

Appendix: Miller, *Establishing Paternity for Purposes of a Child Protective Proceeding*, 8 Mich Child Welfare L J 3 (2004)

Appendix: “Absent Parent Protocol: Identifying, Locating, and Notifying Noncustodial Parents in Child Protective Proceedings”

Chapter 6: Petitions & Preliminary Inquiries 175

6.1	Petitions to Initiate Child Protective Proceedings	175
6.2	Persons Who May Submit a Petition to Court	176
6.3	Prosecuting Attorney’s Role	176
6.4	Required Contents of Petitions	177
6.5	Required Information About Other Court Matters Involving Members of Same Family	179
6.6	Preliminary Inquiries	180
6.7	Court’s Options Following Preliminary Inquiries	181

Chapter 7: Preliminary Hearings	183
7.1 When a Preliminary Hearing Must Be Conducted	184
7.2 Time Requirements for Preliminary Hearings	184
7.3 Adjournments of Preliminary Hearings	185
7.4 Respondents' Right to Counsel	185
7.5 Appointment of Lawyer-Guardians Ad Litem for Children	195
7.6 Powers and Duties of Lawyer-Guardians Ad Litem	197
7.7 Appointment of Attorney for the Child	200
7.8 Appointment of Guardians Ad Litem	201
7.9 Appointment of Court-Appointed Special Advocates (CASAs)	202
7.10 Required Procedures at Preliminary Hearings	203
7.11 Petition Authorization	205
7.12 Procedures Following Petition Authorization	206
7.13 Requirements to Order Alleged Abuser From the Child's Home	206
7.14 Orders Affecting "Nonparent Adults"	209
7.15 Warrantless Arrest of Persons Violating Orders Removing Them From Child's Home	209

Miller, *Lawyer-Guardian ad Litem Protocol—Revised Edition* (MJL, 2006)

Chapter 8: Placement of a Child	213
8.1 Requirements to Release or Place a Child Pending Trial	214
8.2 Type of Placements Available	216
8.3 Required Release of Information When a Child Is Placed in Foster Care	220
8.4 Required Medical Examination of a Child Placed in Foster Care	221
8.5 Requirements for Establishing "Medical Passports"	223
8.6 Required Advice Concerning Initial Service Plans	223
8.7 Parenting Time or Visitation	225
8.8 Order for Examination or Evaluation of Parent, Guardian, Legal Custodian, or Child	227
8.9 Required Findings When Placement Is Ordered	227
8.10 Required "Reasonable Efforts" Finding	228
8.11 Review of Placement and Initial Service Plan	231
8.12 Restrictions on Changes of a Child's Foster Care Placement	233
8.13 Required Notices Prior to Changes of a Child's Foster Care Placement	234
8.14 Required Procedures for Appeals of Changes of Foster Care Placements	235
8.15 Appeals to Family Division or MCI Superintendent of Changes of Foster Care Placements	235
8.16 Emergency Change in a Child's Foster Care Placement	236
8.17 Placement of a Child Pursuant to the Safe Delivery of Newborns Law	239

Chapter 9: Pretrial Proceedings	247
9.1 Pretrial Conferences	247
9.2 Discovery	247
9.3 Motion Practice	249
9.4 Motions to Close Proceedings to the Public	252
9.5 Demand for Jury Trial or Trial by Judge	252
Chapter 10: Pleas of Admission or No Contest	255
10.1 When a Respondent May Make a Plea of Admission or No Contest	255
10.2 Required Advice of Rights and Possible Disposition	256
10.3 Requirement of a Knowing, Understanding, Voluntary, and Accurate Plea	257
10.4 Special Requirements for No Contest Pleas	258
10.5 Records of Plea Proceedings	258
10.6 Withdrawal of Pleas	258
10.7 Combined Adjudicative and Dispositional Hearings	259
Chapter 11: Common Evidentiary Issues in Child Protective Proceedings	261
11.1 Constitutional Issues	262
11.2 Table Summarizing Application of the Rules of Evidence and Standards of Proof	264
11.3 Abrogation of Privileges in Child Protective Proceedings	271
11.4 Admissibility of Statement by a Child Under MCR 3.972(C)	272
11.5 Exceptions to the “Hearsay Rule” Commonly Relied Upon in Child Protective Proceedings	274
11.6 Child Witnesses Are Not Presumed Incompetent	291
11.7 In-Camera Conferences	292
11.8 Alternative Procedures to Obtain Testimony of Child or Developmentally Disabled Witnesses	292
11.9 “Other Acts” Evidence	298
11.10 Evidence Admitted at a Hearing May Be Considered at Subsequent Hearings	305
11.11 Expert Testimony in Child Protective Proceedings	305
11.12 Requirements for the Use of Photographs	312
11.13 Prohibition Against Calling Lawyer-Guardian Ad Litem as Witness	315

Chapter 12: Trials	317
12.1 Trials in Child Protective Proceedings	317
12.2 Time Requirements	318
12.3 Parties Who May Be Present at Trial	319
12.4 Rules of Evidence and Standard of Proof	319
12.5 Jury Procedures	319
12.6 Jury Instructions	321
12.7 Lawyer-Guardian ad Litem Recommendation	321
12.8 Motions for Directed Verdict in Jury Trials	321
12.9 Taking the Verdict in Jury Trials	322
12.10 Court's Authority to Call Additional Witnesses	322
12.11 Findings of Fact and Conclusions of Law by Judge or Referee	323
12.12 Records of Proceedings at Adjudicative Hearings	323
12.13 Motions for Rehearing or New Trial	324
 Appendix: Child Protection Jury Instructions	
 Chapter 13: Initial Dispositions	 349
13.1 The Dispositional Phase of Child Protective Proceedings	350
13.2 Purpose of Initial Dispositional Hearings	350
13.3 Time Requirements	351
13.4 Parties Who May Be Present at Initial Dispositional Hearings	351
13.5 Rules of Evidence and Reports at Initial Dispositional Hearings	352
13.6 Required Case Review and Testimony by Child's Physician	353
13.7 Case Service Plans	355
13.8 Required "Reasonable Efforts" Determination	356
13.9 Dispositional Options Available to Court	359
13.10 Orders to Comply With Case Service Plans	364
13.11 Provision of Records to Child's Foster Care Provider	365
13.12 Scheduling Review Hearings	365
13.13 Revising Case Service Plans	366
13.14 Supplemental Orders of Disposition	366
13.15 Additional Allegations of Abuse or Neglect	366
 Chapter 14: Paying the Costs of Child Protective Proceedings	 369
14.1 Federal, State, and County Sources of Funding	369

14.2 Orders for Reimbursement of the Costs of Care or Services When a Child Is Placed Outside the Home	375
14.3 Orders for Reimbursement of the Costs of Service When a Child Is Placed in the Child's Own Home	380
14.4 Using a Child's Governmental Benefits to Reimburse the Costs of Care	380
14.5 Using Wage Assignments to Pay Reimbursement Orders	380
14.6 Orders for Reimbursement of Attorney and Lawyer-Guardian ad Litem Fees	381

Appendix: Funding Source Charts

Chapter 15: Review of Referee's Recommended Findings & Conclusions 383

15.1 Hearings a Judge Must Conduct	383
15.2 Hearings a Referee May Conduct	384
15.3 Referees' Authority	384
15.4 Required Summary of Testimony and Recommended Findings and Conclusions	386
15.5 Advice of Right to Seek Review of Referee's Recommended Findings and Conclusions	386
15.6 Judicial Review of Referee's Recommended Findings and Conclusions	386
15.7 Procedural Requirements	387
15.8 Time Requirement for Judge's Consideration of Request	387
15.9 Stay of Proceedings	388
15.10 Standard of Review	388
15.11 Remedies	388

Chapter 16: Dispositional Review Hearings 389

16.1 Time Requirements for Review Hearings	389
16.2 Required Procedures and Rules of Evidence at Dispositional Review Hearings	393
16.3 Required Review of Progress Toward Compliance With the Case Service Plan	393
16.4 Modification of the Case Service Plan	395
16.5 Amended or Supplemental Orders of Disposition	395
16.6 Records of Dispositional Review Hearings	396
16.7 Review Hearings for Children at Home	396
16.8 Requirements to Order a Change in Placement When a Child Is at Home	397
16.9 Emergency Removal of a Child Placed at Home	398

Chapter 17: Permanency Planning Hearings	401
17.1 Purpose of Permanency Planning Hearings	401
17.2 Requirements of the Child’s Supervising Agency	403
17.3 Time Requirements	406
17.4 Required Procedures and Rules of Evidence at Permanency Planning Hearings	409
17.5 Court’s Options Following Permanency Planning Hearings	410
17.6 Required Request for Termination of Parental Rights Under Federal Law	415
Chapter 18: Hearings on Termination of Parental Rights	419
18.1 When the Court May Consider a Request for Termination of Parental Rights	420
18.2 Petition Requirements	422
18.3 Standing to File Petition Requesting Termination of Parental Rights	422
18.4 “Respondent” Defined	424
18.5 No Right to Jury Trial	424
18.6 Suspension of Parenting Time	424
18.7 Standard and Burden of Proof Required to Establish Statutory Basis for Termination	425
18.8 Requirements for the “Best Interest” Step	427
18.9 Termination of Parental Rights at Initial Dispositional Hearing	431
18.10 Termination of Parental Rights on the Basis of New or Different Circumstances	432
18.11 Termination of Parental Rights in Other Cases	434
18.12 Required Findings by the Court	436
18.13 Required Advice of Rights	438
18.14 Voluntary Termination of Parental Rights	439
18.15 Termination of One Parent’s Rights Under the Juvenile Code	439
18.16 Effects of Termination of Parental Rights	440
18.17 An Overview and History of §19b(3) of the Juvenile Code	441
18.18 Termination on the Grounds of Desertion—§19b(3)(a)	443
18.19 Termination on the Grounds of Physical Injury or Sexual Abuse—§19b(3)(b)	445
18.20 Termination on the Grounds of Failure to Rectify Conditions Following the Court’s Assumption of Jurisdiction—§19b(3)(c)	449
18.21 Termination on the Grounds of Substantial Failure to Comply With Limited Guardianship Placement Plan—§19b(3)(d)	455
18.22 Termination on the Grounds of Substantial Failure to Comply With Court-Structured Guardianship Placement Plan—§19b(3)(e)	455
18.23 Termination on the Grounds of Parent’s Failure to Support, Visit, Contact, and Communicate With Child Who Has Guardian—§19b(3)(f)	456
18.24 Termination on the Grounds of Failure to Provide Proper Care or Custody—§19b(3)(g)	457

18.25 Termination on the Grounds of Imprisonment of the Parent—§19b(3)(h)	463
18.26 Termination on the Grounds of Prior Termination of Parental Rights to Siblings—§19b(3)(i)	465
18.27 Termination on the Grounds of Reasonable Likelihood of Harm to Child—§19b(3)(j)	466
18.28 Termination on the Grounds of Serious Abuse of Child or Sibling—§19b(3)(k)	467
18.29 Termination on the Grounds of Prior Involuntary Termination of Parental Rights to Another Child—§19b(3)(l)	468
18.30 Termination on the Grounds of Prior Voluntary Termination of Parental Rights to Another Child—§19b(3)(m)	468
18.31 Termination on the Grounds of Conviction of a Serious Offense—§19b(3)(n)	469

Chapter 19: Post-Termination Review Hearings 471

19.1 Purpose of and Time Requirements for Post-Termination Review Hearings	471
19.2 Required Findings and Conclusions Following Review Hearings	473
19.3 “Legal Risk Placement”	473
19.4 Termination of Jurisdiction	474

Chapter 20: “Child Custody Proceedings” Involving Indian Children 477

20.1 General Requirements of the Indian Child Welfare Act	478
20.2 Purpose of the Indian Child Welfare Act	478
20.3 Determining Whether a Child Is an “Indian Child”	479
20.4 Notice of Proceedings to Parent and Tribe or Secretary of Interior	481
20.5 Transfer of Case to Tribal Court	486
20.6 Additional Time Required to Prepare for Proceedings	489
20.7 Custodian’s and Tribe’s Rights to Intervene in Proceedings	489
20.8 Emergency Removal of Indian Child From Home	489
20.9 Requirements for Involuntary Foster Care Placements	490
20.10 Preferred Placements of Indian Children	492
20.11 Required Procedures to Involuntarily Terminate Parental Rights	494
20.12 Expert Witness Testimony	496
20.13 Requirements for Voluntary Foster Care Placement or Consent to Termination of Parental Rights	496
20.14 Invalidation of State Court Action for Violation of the Indian Child Welfare Act	498

Appendix: DHS *Services Manual*, CFF 742 and 744

Appendix: Bureau of Indian Affairs, *Guidelines for State Courts; Indian Child Custody Proceedings*

Chapter 21: Appeals	499
21.1 Special Time Requirement for Rehearings Following Termination of Parental Rights	499
21.2 Court Rules Governing Appeals in Child Protective Proceedings	499
21.3 Appeals to the Michigan Court of Appeals	500
21.4 Filing Requirements	501
21.5 Delayed Appeals	504
21.6 Standards of Review	505
21.7 Collateral Attack of Jurisdiction	505
21.8 Stay of Orders	506
 Chapter 22: Family Division Records	 507
22.1 Family Division Records	507
22.2 Access to Confidential Files	510
22.3 Records of Proceedings in Family Division	511
22.4 Access to Records of Closed Protective Proceedings by Persons With a Legitimate Interest	512
22.5 Destruction of Family Division Records and Files	512
 Subject Matter Index	 513
Citation Index	525
Case Citation Index	533